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October 6, 2022

**VIA ECF**

United States District Court  
Southern District of New York  
Attn: Jennifer L. Rochon, U.S.D.J.  
500 Pearl Street, Courtroom 20B  
New York, NY 10007-1312

**Re: Rosenfield & Co., PLLC v. Trachtenberg, Rodes & Friedberg LLP, *et al.***  
**S.D.N.Y. Case No.: 1:21-cv-3858 (VM) (KHP)**  
**MLLG File No. 123-21**

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Dear Judge Rochon:

This firm represents the Star Defendants in the above-referenced case. This letter is submitted jointly by all parties pursuant to the Court's September 22, 2022 Order directing the parties to submit a joint status report.

Star Defendants and Plaintiff, Rosenfield & Co., PLLC have been exchanging paper discovery and have agreed to continue to produce documents on a rolling basis. Additional documents still need to be produced, and given the extensive amount of documents, the parties will need time to review and analyze the documents.

The Trachtenberg, Rodes & Friedberg LLP Defendants ("TRF Defendants") will be filing a motion to dismiss for which the Court recently endorsed the parties' briefing schedule. Pursuant to the Court's September 30, 2022 Order, the motion will be fully briefed on December 16, 2022. Because of the anticipated motion to dismiss, Star and TRF Defendants have not exchanged discovery demands. TRF Defendants and Plaintiff have also agreed to hold written discovery and document production in abeyance, and have been discussing the possibility of a global mediation.

To preserve economic resources, the parties respectfully request that they be permitted to agree to hold certain discovery as well as all depositions in abeyance until after TRF Defendants' motion to dismiss is decided by the Court.

Respectfully submitted,

/s/ \_\_\_\_\_  
Jamie S. Felsen

via ECF (all counsel of record).